



KOSS & SCHONFELD, LLP
ATTORNEYS AT LAW

July 23, 2021

By ECF

Hon. Gabriel W. Gorenstein
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007-1312
GorensteinSettlement@nysd.uscourts.gov

MEMORANDUM ENDORSEMENT

Re: *GateGuard, Inc. v. Goldmont Realty Corp., et al.*
Case No.: 1:20-cv-01609-AJN-GWG

Dear Judge Gorenstein:

This office represents defendants Goldmont Realty Corp. (“Goldmont”), Leon Goldenberg and Abi Goldenberg in the above referenced action (collectively, the “Defendants”). The parties jointly write to request an extension of time to complete discovery through November 1, 2021, in accordance with the schedule below.

Following a “meet and confer” on July 22, 2021, lasting more than an hour and 10 minutes, and in light of discovery which remains outstanding, the parties have agreed to the following schedule, subject to the approval of the Court:

1. A 30(b)(6) deposition of Gateguard shall occur between August 3, 2021 and August 5, 2021, and counsel for Gateguard shall advise counsel for Defendants of the date certain, by email not less than forty-eight (48) prior to the date of such deposition;
2. Deposition of Abi Goldenberg shall occur on or before August 10, 2021, and counsel for Goldmont shall advise counsel for Gateguard of the date certain, by email not less than forty-eight (48) prior to the date of such deposition;
3. Deposition of Leon Goldenberg shall occur on or before August 17, 2021, and counsel for Goldmont shall advise counsel for Gateguard of the date certain, by email not less than forty-eight (48) prior to the date of such deposition; and
4. Discovery to be completed by November 1, 2021.

The parties have further agreed that any party’s failure to testify at the depositions as scheduled shall constitute contempt under Rule 37(b).

We thank the Court for its consideration to the above.

Respectfully Submitted,
By: /s/ Simcha D. Schonfeld
Simcha D. Schonfeld, Esq.
Tel: (212) 796-8916
Email: sds@kandsllp.com

cc: Ariel Reinitz, Esq. (via ECF)

SO ORDERED:

GABRIEL W. GORENSTEIN
United States Magistrate Judge

The schedule proposed in this letter is approved.

So Ordered.



GABRIEL W. GORENSTEIN
United States Magistrate Judge
July 26, 2021